

ANN BAVENDER*
JAMES A. CASEY
KAREN L. CASSEY*
ANNE GOODWIN CRUMP*
VINCENT J. CURTIS, JR.
PAUL J. FELDMAN*
ERIC FISHMAN*
RICHARD HILDRETH
EDWARD W. HUMMERS, JR.
FRANK R. JAZZO
CHARLES H. KENNEDY*
KATHRYN A. KLEIMAN
PATRICIA A. MAHONEY
M. VERONICA PASTOR*
GEORGE PETRUTSAS
LEONARD R. RAISH
JAMES P. RILEY
MARVIN ROSENBERG
KATHLEEN VICTORY*
HOWARD M. WEISS

* NOT ADMITTED IN VIRGINIA

FLETCHER, HEALD & HILDRETH, P.L.C.

ATTORNEYS AT LAW

11th FLOOR, 1300 NORTH 17th STREET

ROSSLYN, VIRGINIA 22209-3801

(703) 812-0400

TELECOPIER

(703) 812-0486

INTERNET

HILDRETH@ATTMAIL.COM

ROBERT L. HEALD
(1956-1983)
PAUL D.P. SPEARMAN
(1936-1982)
FRANK ROBERSON
(1936-1981)
RUSSELL ROWELL
(1948-1977)

RETIRED
EDWARD F. KENEHAN
FRANK U. FLETCHER

CONSULTANT FOR INTERNATIONAL AND
INTERGOVERNMENTAL AFFAIRS
SHELDON J. KRYSS
U. S. AMBASSADOR (ret.)

OF COUNSEL
EDWARD A. CAINE*

WRITER'S NUMBER
(703) 812-

0480

September 7, 1995

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

VIA HAND DELIVERY

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W. - Room 222
Washington, D.C. 20554

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Re: CC Docket No. 92-297

Dear Mr. Caton:

On behalf of the Harris Corporation-Farion Division ("Harris"), we are filing an original and seven (7) copies of its Comments on Third Notice of Proposed Rulemaking in the above-referenced matter.

If there are any questions, please communicate with the undersigned counsel.

Respectfully submitted,

FLETCHER, HEALD & HILDRETH, P.L.C.

Leonard Robert Raish

Leonard Robert Raish
Counsel for Harris Corporation-Farion Division

LRR:cej
Enclosures

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BEFORE THE
Federal Communications Commission

WASHINGTON, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of

Rulemaking to Amend Parts 1, 2, 21 and 25
of the Commission's Rules to Redesignate
the 27.5 - 29.5 GHz Frequency Band, to
Reallocate the 29.5 - 30.0 GHz Frequency
Band, to Establish Rules and Policies for
Local Multipoint Distribution Service and
for Fixed Satellite Services

CC Docket No. 92-297

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**COMMENTS OF HARRIS CORPORATION-FARINON DIVISION
ON THIRD NOTICE OF PROPOSED RULEMAKING**

Pursuant to Section 1.415 of the Commission's rules, 47 C.F.R. § 1.415, the Harris Corporation-Farinon Division¹ hereby submits its comments on the Commission's *Third Notice of Proposed Rulemaking* in the above-captioned proceeding, FCC 95-287, released July 28, 1995 ("*Third Notice*").² In the comment below, Harris protests that the Commission's action in the *Third Notice* sweeps aside the requirements for spectrum allocation in the "28 GHz" band for traditional terrestrial fixed microwave communications.

Harris has been a participant in this proceeding from its inception. The 27.5-29.5 GHz band has been allocated for Fixed-Satellite and Fixed Service on a co-primary basis since 1979. It was envisioned as a growth band for terrestrial point-to-point

¹Harris Corporation is a Florida Corporation with its headquarters situated in Melbourne, Florida. Through its Farinon Division it is a leading manufacturer of microwave equipments used for fixed point-to-point communications in both common carrier and private radio systems.

²By Order of the International Bureau, the date for filing comments was extended to September 7, 1995. DA 95-1866, released August 25, 1995.

communications. Recognizing new and developing requirements for point-to-point microwave communications, on April 19, 1991, Harris filed a Petition to amend Parts 2, 21, and 94 of the Commission's Rules to adapt a channelization Plan for the "28 GHz" band that would permit manufacturers to design standardized internationally accepted equipment. Harris envisaged thriving domestic and export market demands for 28 GHz band point-to-point microwave equipments. Instead of acting on the Harris Petition the Commission in the Third Notice, focussed on LMDS and satellite related systems and excluded terrestrial point-to-point communications.

The Telecommunications Industry Association (TIA) through its Fixed Point-to-Point Communications Section has prepared and is filing separately comments in response to the Third Notice. Harris participated extensively in the preparation of the aforementioned TIA comments and fully supports them in every respect. In the public interest, the Commission is urged to accord favorable consideration to the TIA comments in this proceeding.

Respectfully submitted,

HARRIS CORPORATION-FARINON
DIVISION

By: 
Leonard Robert Raish

Its Attorney

FLETCHER, HEALD & HILDRETH, P.L.C.
1300 North 17th Street - 11th Floor
Rosslyn, Virginia 22209
(703) 812-0400

Dated: September 7, 1995

cej/lrr/r#4/harris6.plead